

**To:** Tom Hagler/R9/USEPA/US@EPA[]  
**Cc:** Gary Bobker [bobker@sbcglobal.net]  
**From:** "Jon Rosenfield, Ph.D."  
**Sent:** Mon 3/19/2012 4:10:17 PM  
**Subject:** Re: Fw: Quick question on the EA comments.  
[NGO BDCP EA comments FINAL 11-8.pdf](#)  
[Appendices C and D comments final.pdf](#)  
[TBI Appendix F comments--revised.pdf](#)  
[Comments on Appendix G 122012.pdf](#)  
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<http://www.crowdrise.com/Jonrosenfield>

Hi Tom

"Jeez!" is a diplomatic way of putting it ;-)

Seems like the Appendices on the web now were released in December. We were commenting mostly on earlier versions released in November. Given that our comments on the various technical appendices came in after the "updated" versions now available, I don't think they respond to our comments.

One of the many frustrating practices of the BDCP process is that it never responds to comments -- many of the comments you read (categorical and detailed) in our February summary were identical to comments we made on earlier drafts of the EA.

Another frustrating practice is the constantly shifting versions of documents. We were invited to comment informally on the Technical Appendices released in fall 2011. But it looks like those appendices were updated in December 2011 (without our comments). Then, in February, they released a "roll up" of the Technical Appendices (the EA) that is based on further revisions of the technical appendices, which somehow won't be available for release for another month. A similar thing happened when they asked the NRC to review the previous EA -- the panel panned the EA and BDCP responded "oh, that old thing?!? You should read the new version..."

In case you think they might still be relevant, I'm attaching our appendix-by-appendix comments. Our "EA briefing" document was based on these comments.

Let me know if you've got questions.

Best wishes,  
JR

On Fri, Mar 16, 2012 at 2:05 PM, <bobker@sbcglobal.net> wrote:

Sent from my Verizon Wireless BlackBerry

From: Tom Hagler <Hagler.Tom@epamail.epa.gov>  
Date: Fri, 16 Mar 2012 13:58:49 -0700

To: <bobker@sbcglobal.net>  
Subject: Quick question on the EA comments.

I'm reading through the TBI/DOW paper on the Effects Analysis (Jeez!)

What version of Appendix C, F and G were you guys referencing when you wrote that?

I ask because apparently there is a new version of at least C, G and the life cycle appendices floating around and coming out in late March - middle April. No idea whether they are trying to respond to your stuff. They probably should.....

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--"Unless ...."

Help me protect San Francisco Bay and its watershed: <http://www.crowdrise.com/Jonrosenfield>